

REMARKS

In response to the claims and specification objections, the claims have been amended to remove the reference characters and to remove the means plus function language. Accordingly, withdrawal of the objections is respectfully requested.

Claims 34, 39, and 40 have been amended to clearly recite statutory subject matter. Accordingly, withdrawal of the §101 rejections is respectfully requested.

The claims have been amended to overcome the §112, second paragraph rejections. Accordingly, withdrawal of the §112 rejections is respectfully requested.

The Examiner has rejected all of the outstanding claims as being anticipated by PETERSON et al. The Examiner has also rejected all of the outstanding claims as being unpatentable over PETERSON et al. in view of JOHNSON et al. Applicants respectfully traverse.

It is submitted that the claims, as amended, recite a variety of features not taught or suggested by the applied references. Consequently, it is respectfully requested that the Examiner withdraw all of the §102 and §103 rejections.

The Examiner has set forth definitions of several claim terms. While applicants do not disagree that the claim language may cover the examiner's definitions, it is noted that the claim language is not limited by the definitions, whatsoever. Furthermore, applicants do not agree that all of the claim terms are only to be given their ordinary and accustomed meaning. The specification should be carefully consulted for each claim term to facilitate an understanding of the specific claim term. Applicants should not have to define every claim term at this point in the prosecution. The Examiner has provided no authority for such an unduly burdensome requirement. It is believed that

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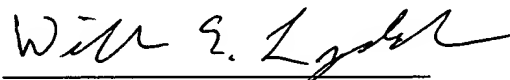
"reasonableness" (as cited in footnote 10) is not an authority or an adequate justification for the onerous request. Applicants submit that this is neither the time nor the place for an exhaustive definition of the claim terms. Finally, applicants direct the Examiner to Phillips v. AWH Corp. (Fed. Cir. 2005) (en banc), which has been recently decided and affects the law of claim construction and the cases the Examiner relied upon. In sum, applicants strenuously object to the Examiner's adopted definitions of the claim terms and the general assertion that applicants are not acting as their own lexicographer.

The amendments to the claims and the new claims add no prohibited new matter.

Any amendments to the claims that have been made in this amendment, and that have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions or comments regarding this amendment, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
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